From:	POULSEN Mike
To:	Dana Davoli/R10/USEPA/US@EPA
Cc:	Rene Fuentes/R10/USEPA/US@EPA; Sean Sheldrake/R10/USEPA/US@EPA; Eric Blischke/R10/USEPA/US@EPA; rgensemer@parametrix.com; Burt Shephard/R10/USEPA/US@EPA
Subject:	RE: COCs to consider for future wastes going into T4 CDF
Date:	04/23/2007 10:10 AM

Dana -

They certainly hit most of the main risk drivers. I don't feel strongly about this, but here are some other chemicals to consider. For metals, maybe cadmium and chromium. Perhaps manganese. Organochlorine pesticides are likely covered by the DDTs. For the PAHs you probably only need some representative ones, which they have. Perchlorate would definitely have different transport properties from the other chemicals considered, but we're excluding Arkema-specific chemicals. There is no mention of dioxins. I don't know if we should be focusing on them (because we have PCBs), but the screening is based on toxicity only now. Mass loading and bioaccumulation potential are not considered. If PCBs and DDTs are modeled, we can work out later how to consider bioaccumulation.

It may not be important now, but I have a question on their summary table. They present the 90th percentile for the regular data, but not a UCL on the arithmetic mean. Then, for the Thiessen polygon evaluation, they present an area-weighted 90UCL. I don't know how they calculated this. I have one idea on how I might do it, but I don't know what will hold up statistically. In general, I like the idea of area weighting (if appropriate for the evaluation), but I've always been tripped up by how to calculate the UCL on the mean (required by our rules). I would like to find out how they did the calculation.

- Mike

-----Original Message-----
From: Davoli.Dana@epamail.epa.gov [mailto:Davoli.Dana@epamail.epa.gov]
Sent: Wednesday, April 18, 2007 9:31 AM
To: blischke.eric@epa.gov; rgensemer@parametrix.com; Shephard.Burt@epamail.epa.gov; Fuentes.Rene@epamail.epa.gov; Sheldrake.Sean@epamail.epa.gov; POULSEN Mike; Davoli.Dana@epamail.epa.gov
Subject: COCs to consider for future wastes going into T4 CDF

As you know, a CDF is being built at the Port's "T4 site".Only part of the CDF will be filled with sediments from T4. The rest of the sediments going into the CDF will possibly be from sediments in Portland Harbor. We asked the Port to model the impacts of non-T4 wastes that might go into the CDF. They have suggested a method to select the COCs from PH that should be modeled. Could you please look at the attached material and suggest any COCs that might not be covered by the COC selection method they are using. We do have to limit the number of COCs considered so I wouldn't expect every COCs in PH to be considered, but at least the major ones.

Port provided suggested harborwide sediments analysis process in April 13 mtg (no major red flags ID'd)
Port owes EPA details of chemistry evaluation and proposed COC list and rationale
Once agreement is made on COCs for harborwide evaluation, Port will provide leachate and permeability estimates for EPA agreement
A meeting will likely be required to review and have EPA okay COC list as well as leachate predictions in order to finalize the long-term set up

(See attached file: PH Screening Process_04-13-07.pdf) (See attached file: PH Stats Summary 04-12-07.pdf)